

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

Latisha A Reed : NO. 19-17972-mdc

OBJECTION TO CERTIFICATE OF DEFAULT AND CERTIFICATE OF SERVICE

Debtor, by her counsel, object to the certificate of default and request the Court not enter a relief order and to please hold a hearing due to the following:

The Debtor a number of payments and expects to be fully current by April 5, 2024.

/s/David M. Offen
David M. Offen
Attorney for Debtor
The Curtis Center
601 Walnut Street, Suite 160
Philadelphia, Pa. 19106
215-625-9600
info@offenlaw.com

A copy of this Objection is being served on MARK A. CRONIN, Esquire and the Chapter 13 Trustee.

/s/ David M. Offen
David M. Offen
Attorney for Debtor